

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY
DOCKET NO. R2000-1

INTERROGATORIES FROM UNITED PARCEL SERVICE
TO MAGAZINE PUBLISHERS OF AMERICA, INC., et al.
WITNESS SANDER A. GLICK
(UPS/MPA-T2-1 and 2)
(June 19, 2000)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories directed to Magazine Publishers of America, Inc., et al. witness Sander A. Glick: UPS/MPA-T2-1 and 2.

Respectfully submitted,



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UPS/MPA-T2-1. On page 17, lines 1-15, of your testimony, you quote from the Periodicals Operations Review Team's "Team Report" at 25 describing the bundle breakage problem and suggesting ways in which the Postal Service might improve its processing of bundles.

(a) List the identities of the organizations participating in the Periodicals Operations Review Team and the number of team members from each listed organization.

(b) Confirm that the summaries and opinions reflected in the Team Report generally reflect those of the Periodicals Operations Review Team as a whole. If you do not confirm, explain.

(c) Confirm that the portion of the Team Report cited on page 17, lines 1-15, referenced above reflect the views and opinions of the Periodicals Operations Review Team as a whole.

UPS-MPA-T2-2. On page 17, lines 7-13, of your testimony, you cite the Operations Review Team Report as stating, "The main problem [resulting in bundle breakage] is with the pallet dumping and subsequent bundle travel on highly congested feed belts Some facilities have developed better techniques than others for minimizing SPBS bundle breakage, e.g., by carefully controlling the bundle volume dumped on the feed belt at any one time."

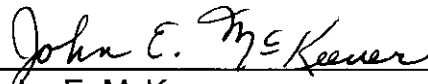
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(a) Is it your understanding that the frequency of bundle breakage is positively associated with the volume of bundles being processed? Explain your answer fully.

(b) If your answer to (a) is yes, also consider page 17, lines 17-20, of your testimony, where you cite the Team Report as stating, "The cost impact of SPBS bundle breakage may be magnified, because SPBS employees choose to key individual pieces in such [broken] bundles rather than to salvage partially broken bundles." In light of your response to part (a) and the fact that SPBS employees key individual pieces of broken bundles, is it your understanding that total piece handlings, as recorded by SPBS machine counts, increase disproportionately with the actual number of bundles arriving at SPBS machines for processing?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document by first class mail, postage prepaid, in accordance with Section 12 of the Commission's Rules of Practice.



John E. McKeever
Attorney for United Parcel Service

Dated: June 19, 2000
Philadelphia, Pa.